of Violation Pursuant to Req of the Resource Conservation and Recover, ...ct (RCRA) TO: Facility Name: Litton Instruments & Life Support

Address: Hickory Grave Road

Davenbort IA 52808-4508

ments

DEC 04 1991

- Failure to maintain adequate aisle space in hazardous waste storage Area (HD CFR 264, 35)
- Failure to separate drums containing incompatible
hazardous wastes in the haz waste storage area (40CFR 264.17) - Hazardous waste stored in a leaking drum in Haz waste
- Unlabeled drums containing bazardous waste (DOOZ) in
Haz waste container storage area. (40 CFR 262, 34).
- No device, such as a telephone or two way radia in haz, weste storage area (40 CFR 264.32(b)). Also no
device available when one employee is an premises (40 CFR 264)
3 J.m. Klemms) (40 (FR 264.16 (a)(1)
Environmental Protection Agency, Region VII, 726 Minnesota
on this Notice or wish to discuss your response, you may call (U. S. EPA) at (913) 551 - 7884, or Kentherstowski, (Michael D. Mac Look Date: 11/20/91
on this Notice or wish to discuss your response, you may call (U. S. EPA) at (913) 551 - 7884, or ken Herstowski, (913) 551 Thichael D. Mac Store Date: 11/20/91 reby acknowledges that he/she has received a copy of this
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N of Violation Pursuant to Requiments
of the source Conservation and Recovery Act (RCRA) Page 2 of 4

TO: Facility Name: Litton	Instruments & Life Support
Davene	Grove Road, P.O. Box 4508 TO 101
EPA ID Number: IADODS	2 68 420 Date: 11/19, 20/91
	ompleted to determine compliance with the requirements of lations promulgated pursuant thereto, the following
Citation	Description of Violation
Pecmit II J 1 (a) 40 (FR 262,11 (c) (Perm.+IIB)	- Failure to include haz wastes physical form, process, estimated weight volume, and density; method handling code. (40 CFR 2641 App I (1)(2)(3)). - Failure to determine if the following are hazardous wastes we respect to tell? - Lapping wastes oils.
	· Waste oils · Water soluable outling fluids
	· Nickel Plating wastes in Satellite Acc. Area
	· Waste, and in Storage arec- Stored over 1 year Sando- Fix (Nickel Acetate) + Manifest # WIJ192749 (8/20/91)
Permit III A. 1.	· Paint waste in Paint spray booth and spray booth filters - Storage of Hazardous waste (Freen TF) in storage area which is not included in the permit.
earliest possible time. The trative Civil Complaint) is:	call your attention to those areas of noncompliance at the is notice does not constitute a compliance order (Adminissued pursuant to Section 3008 of RCRA and may not be a lations which may be identified as a result of this inspection.
schedule for completion of Chief, RCRA Branch, U. S. Er Ave., Kansas City, Kansas, Will be considered in subsec	is hereby requested to submit in writing within 10 ice a description of all corrective actions taken and/or a necessary correction actions to be taken to: Mike Sanderson, nvironmental Protection Agency, Region VII, 726 Minnesota 66101. The corrective actions taken by Litton Its quent enforcement follow-up. Should civil penalties be (s) will be considered in assessing the penalty amount.
Tran Tran (913 551 USEPA), at 191	(U. S. EPA) at (913) 551-7884, or Ven Herstowski,
This Notice prepared by	ichael D. Mac Stor Date: 11/20/91
The undersigned person here Notice and has read same.	by acknowledges that he/she has received a copy of this
Pr	inted Name: RICHARD SEDEROUIST Date: 1160/91
	gnature: Richard Schut
Ti	tle: MGR. SAFETY HEALTH & ENU.

Note of Violation Pursuant to Rements of the Resource Conservation and Recove., Act (RCRA)

Page 3 of 4

TO: Facility Name: Litton	Instruments & Life Support
Address: Hickory	Grave Road, PO Box 4508
EPA ID Number: IADOOS	Date: 11/19,20/91
	impleted to determine compliance with the requirements of ations promulgated pursuant thereto, the following
Citation	Description of Violation
Permit I B.	Improper Waste designation on LDR notice for identification of corresponding treatment standard (40CFR 2687 (a) (1) ii) on the following manifests: IL 30 20543 (Aug. 3, 1989); and IL 30 20542 (Mai: 16, 1930)
40 CFR 262.11(C) (Permit II B)	- Failure to determine if waste (Lapping Sludge) is a haz. waste with respect to TCLP prior to shipment offsite (IL 5008264, 6/23/89)
Permit I.J. 1 (b)	- Failure to include manifest document number in operating record for wastes shipped offsite (Manifest # IL5008264, 6/23/89).
Permit II J 1 (c)	- Failure to include records and results of waste analyses performed in the operating record. (40 CFR 264.73(b)(3)).
Permit III A. 2. (40 CFR 265)	- Storage of hazardous waste over 30 days in a non-permitted area - Waste paints, largues, acids former, film developing chemicals, acids
" 40 CFR 262,11(C) (Permit IIB)	- Failure to determine as hazardous wastes the waste paints (1/20/2)
earliest possible time. Thi trative Civil Complaint) iss complete listing of all viol The Litton ILS Facility days of receipt of this noti schedule for completion of management of the considered in subsequent to the consi	is hereby requested to submit in writing within 10 ce a description of all corrective actions taken and/or a necessary correction actions to be taken to: Mike Sanderson, avironmental Protection Agency, Region VII, 726 Minnesota follow-up. Should civil penalties be (s) will be considered in assessing the penalty amount.
TRAN TRAN [USEPA), at (913	
This Notice prepared by	charl D. Mac Ser Date: 11/20/91
	by acknowledges that he/she has received a copy of this
Pri	inted Name: RICHARD SEDERQUIST Date: 11/20/9/
	gnature: Richard Judit Date: 11/20/9/
Ti	tle: MOR SAFFIY MEALTH & FNU.

No of Violation Pursuant to Requients Page 4 of 4 of the Resource Conservation and Recovery act (RCRA)

TO: Facility Name: Litto	n Instruments & Life Support
Address: Hickor	4 Grove Road, P.O. Box 4508
EPA ID Number: TAPO	Date: 11/19,20/91
	completed to determine compliance with the requirements of ulations promulgated pursuant thereto, the following:
Citation	Description of Violation
40 CFR 262.34(C)(1)(i)	- Failure to close containers holding hazardous waste
Permit II D. 1,3	- Failure to comply with General Inspection Requirements in regards to leaking drum, damaged drums, and improper
	not included in inspection reports.
Permit II D Z	- Failure to keep additional 55-gal (2) and 83-gal (8) drums in hazardous waste storage area as specified in the
40 CFR 268.50 C	- Failure to prove that storage of hazardous waste (Fu in haz waste storage area is not being stored for purpose of a
48 CFR 265. 174	- Failure to inspect Freen Satellite Accumulation in oil house and small container waste storage in Dept. 910
earliest possible time. The trative Civil Complaint) is complete listing of all violation. The days of receipt of this not schedule for completion of Chief, RCRA Branch, U. S.	call your attention to those areas of noncompliance at the his notice does not constitute a compliance order (Adminissued pursuant to Section 3008 of RCRA and may not be a olations which may be identified as a result of this inspection is hereby requested to submit in writing within 10 tice a description of all corrective actions taken and/or a necessary correction actions to be taken to: Mike Sanderson (Environmental Protection Agency, Region VII, 726 Minnesota 66101. The corrective actions taken by Litter ILS
will be considered in subs	equent enforcement follow-up. Should civil penalties be n(s) will be considered in assessing the penalty amount.
	on this Notice or wish to discuss your response, you may call (U. S. EPA) at (913) 551-7884, or Ken Herstowski,
This Notice prepared by	Tichael D. Mac Sept Date: 11/20/91
The undersigned person her Notice and has read same.	eby acknowledges that he/she has received a copy of this
P	rinted Name: PICHARD SEDERQUIST Date: 11/20/9/
	ignature: Rechard Sederat
T	itle: MGR SAFFTY HEALTH - E ENU.

No e of Violation Pursuant to Remembers of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Littor	Instrum	ments & Life	Support	
Address: Hickory	Grove R	and P.O. Box	4508	DFC 04 1991
EPA ID Number: TAPOS	268420	52808 - 4508	Date: 11/19,2	0/9 OWA SECTION
During an inspection just co Subtitle C of RCRA and regul violations were identified:	ompleted to			
Citation		Descript	ion of Violatio	<u>n</u> 4 ′
Permit II C 4 Permit III B 5 Permit III B 3 Permit II B 3 Permit II C 3 (2016) Permit II C 3 (2016) Permit II F H 1(b)	Hazardeu - Ne drui - Ne dr	to age Area of to separate of is waster in the is waster stored in is storage area ed drums contain the container store ce, such as a to ste storage area vailable when	HO CFR 264.35 Ir ums contain haz. waste sta a leaking dis (HO CFR 264. any hazardous ary area. (HO) elephone of two HO CFR 264.3 one employees a record for two	ing incompatible erage area (40(FR.264.17) and in Haz waste 173(b)) waste (Dooz) in FR 262.34). way radia in (2(b)). Also no
This notice is provided to cearliest possible time. This trative Civil Complaint) is scomplete listing of all viol. The Litton ILS Facility days of receipt of this notifies schedule for completion of many contents, RCRA Branch, U. S. En Ave., Kansas City, Kansas, 6 will be considered in subsequences.	is her is her ce a description which is her cessary convironmental follows. The quent enforcement is the convironment is the c	nes not constituent to Section 30 ch may be idention reby requested to the section of all conception action action action of a protection action acti	te a compliance 108 of RCRA and fied as a resul o submit in writerective action is to be taken to he taken to he taken by Lons taken by Long to he civil	e order (Adminis- may not be a t of this inspection. ting within 10 as taken and/or a co: Make Sandrson, 726 Minnesota penalties be
If you have any questions on Tran Tran Tran (q)	_(U. S. EP/			en Herstowski,
This Notice prepared by		Mac Such	Date:	11/20/11
The undersigned person hereb Notice and has read same.				
Pri	nted Name.	PKHARD SEPE	PROJECT	Date: 11/20/91
	nature:	Relial Se	dugit	
Tit	tle:	MER-SAFETY	PEALTH & &	FNU.

No e of Violation Pursuant to Requements of the Resource Conservation and Recovery Act (RCRA) Page 2 of 4

TO: Facility Name: 1440	n Instruments & Life Support	
Dave	next IA 52809 - 4508	
EPA ID Number: IADO	152 68420 Date: 11/19, 20/91	
	completed to determine compliance with the requirements of gulations promulgated pursuant thereto, the following i:	
Citation	Description of Violation	
Permit II J 1 (a) 40 (FR 262,11 () (Permit II B	- Failure to include haz wastes physical form, process, estimated weight "volume, and density; method handling rode. (40 CFR 264 App I (1)(2)(3)). - Failure to determine if the following are hazardous waster	s world
	LAPPING Waster Oils.	
	· Waste oils · Water solumble Culting fluids	
	· Nickel Plating wastes in Salethite Acc. Area	
	· Sando- Fix (Nickel Acetate) - Manifest # WIJ192749 (8/20) · Paint waste in Paint spray booth and spray booth filters	51)
Permit III A. 1.	- Storage of Hazardous waste (Freon TF) in storage area which is not included in the permit.	
earliest possible time. trative Civil Complaint) complete listing of all v The Little Table Table Table days of receipt of this no schedule for completion of Chief, RCRA Branch, U. S. Ave., Kansas City, Kansas will be considered in sub-	is hereby requested to submit in writing within 10 is hereby requested to submit in writing within 10 is hereby requested to submit in writing within 10 is hereby requested to submit in the state and/or a forcessary correction actions to be taken to: Make Sanderson Environmental Protection Agency, Region VII, 726 Minnesota, 66101. The corrective actions taken by the sanderson sequent enforcement follow-up. Should civil penalties be on(s) will be considered in assessing the penalty amount.	Splent 1
Tran Tran		
This Notice prepared by Z	Michael D. Mac Stor Date: 11/20/91	
The undersigned person he Notice and has read same.	reby acknowledges that he/she has received a copy of this	
	Printed Name: RICHARD SEPERQUIST Date: 1160/91	
	Signature: Richard Schut	
	Title: MGR. SAFETY HEALTH & ENU.	144

No e of Violation Pursuant to Remembers of the Resource Conservation and Recovery Act (RCRA)

Page 3 of 4

TO: Facility Name: Litton	Instruments & Life Support
Address: H. Kary	Grave Boad PO Box 4508
EPA ID Number: TARAGE	268420 Date: 11/19,20/91
	mpleted to determine compliance with the requirements of ations promulgated pursuant thereto, the following
Citation	Description of Violation
Permit II B.	Improper Naste designation of an LDR notice for identification of corresponding treatment standard (40CFR 2627(a)(1)(i)) on the following manifests: IL 3020543 (Aug. 3, 1989); and IL 3020542 (Mai: 16,1990)
40 CFR 262.11(C) (Permit II B)	- Failure to determine if waste (Lapping Studge) is a haz. waste with respect to TELP prior to shipment off site (ILSO08264, 6/23/89)
Permit I.J. 1 (b)	- Failure to include manifest document number in operating tecord for wastes shipped offsite Manifest # ILSOOBDEN, 6/23/89).
Permit II J 1 (c)	- Failure to include records and results of waste analyses
Permit III A. 2. (40CFR 265)	performed in the operating record. (40 CFR 264.73(b)(3)) storage of hazardous waste over 90 days in a non-permitted
#40 (FR 262,116) (Permit IIG)	- For lyre to determine as hezardous wastes the waste paints de protection largues primes ands etc. in oil house storage area - Dept. 910
earliest possible time. Thi trative Civil Complaint) iss	all your attention to those areas of noncompliance at the s notice does not constitute a compliance order (Adminisued pursuant to Section 3008 of RCRA and may not be a ations which may be identified as a result of this inspection.
days of receipt of this noti schedule for completion of n Chief, RCRA Branch, U. S. En Ave., Kansas City, Kansas, 6 will be considered in subseq	is hereby requested to submit in writing within 10 ce a description of all corrective actions taken and/or a ecessary correction actions to be taken to: Make Sanderson, vironmental Protection Agency, Region VII, 726 Minnesota 6101. The corrective actions taken by Little 115 uent enforcement follow-up. Should civil penalties be s) will be considered in assessing the penalty amount.
If you have any questions on TRAN TRAN (USE PA), at 1913	this Notice or wish to discuss your response, you may call (U. S. EPA) at (913) 551-7884, or Ken Her stowski,
This Notice prepared by	charle Mac Len Date: 11/20/91
The undersigned person hereb Notice and has read same.	y acknowledges that he/she has received a copy of this
Pri	nted Name: RICHARD SEDERQUIST Date: 11/20/9/
	nature: Richard Jedust
Tit	tle: MOR SAFFIY MEALTH & ENU.

No me of Violation Pursuant to Requements of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: 1 ++	on Instrum	nents & Life Support	
Address: Hickory	ory Grove Box	d P.O. Box 4508	
EPA ID Number: TADO	052 68420	Date	: 11/19,20/91
During an inspection just Subtitle C of RCRA and re violations were identifie	gulations prom		
Citation		Description of	Violation
40 CFR 262.34 (c)(1)(i) Permit II D. 1,3	- Failure	to comply with Gen	holding hazardous waste eas (40 cer 262.34 (CXI)(i) eral Inspection Requirements amoged drums and improper
Permit TDZ	- Failure	to keep add trood 55:	
40 CFR 268.50 C	- Failure +	to prove that storace . waste storace area is	not being stored for purpose of a
This notice is provided tearliest possible time. trative Civil Complaint) complete listing of all v	This notice do issued pursuan	oes not constitute a co nt to Section 3008 of R	mpliance order (Adminis-
The Litton The Facility days of receipt of this in schedule for completion of Chief, RCRA Branch, U. S. Ave., Kansas City, Kansas will be considered in subassessed, corrective acti	notice a descript necessary continued to the continue of the c	iption of all corrective orrective orrection actions to be a Protection Agency, Recorrective actions take cement follow-up. Shou	e actions taken and/or a taken to: Hike Sanderson gion VII, 726 Minnesota en by Liston ILS ld civil penalties be
TRAN TRAN		ce or wish to discuss y A) at (913) 551-7884	our response, you may call _, or Kentlerstowski,
This Notice prepared by	Thichard DY	Machin	Date: 11/20/91
The undersigned person he Notice and has read same.	ereby acknowled		ceived a copy of this
	Daile at the	2	Datas Ulas Id
	Printed Name: Signature:	Pichard Federalist	Date: 11/20/9/
	Title:	MGR SOFFTY HEALT	H & FNU.